

White, Marlene

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**From:** Witkovski, Gary  
**Sent:** Monday, June 19, 2017 1:46 PM  
**To:** White, Marlene  
**Subject:** FW: Pech Optical NOPF Response FW: Response to notice of preliminary findings  
**Attachments:** ATT00001.txt

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**From:** Herstowski, Ken  
**Sent:** Monday, June 19, 2017 1:44 PM  
**To:** Witkovski, Gary <Witkovski.Gary@epa.gov>; Koesterer, Elizabeth <Koesterer.Elizabeth@epa.gov>; Wood, Heather <Heather.Wood@tetrattech.com>  
**Subject:** Pech Optical NOPF Response FW: Response to notice of preliminary findings

Ken Herstowski  
Project Manager  
EPA Region 7  
ENST/EFCB  
300 Minnesota Avenue  
Kansas City, KS 66101

9135517631  
[herstowski.ken@epa.gov](mailto:herstowski.ken@epa.gov)

RECEIVED  
JUN 20 2017  
AWMD/WEMM

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**From:** Safety Leader [<mailto:Safety@pech.com>]  
**Sent:** Monday, June 19, 2017 1:18 PM  
**To:** Herstowski, Ken <[Herstowski.Ken@epa.gov](mailto:Herstowski.Ken@epa.gov)>  
**Cc:** Gerald Koolstra <[Gerald@pech.com](mailto:Gerald@pech.com)>; 'Roger Arrowood' <[rarrowood@essilorusa.com](mailto:rarrowood@essilorusa.com)>  
**Subject:** Response to notice of preliminary findings

TO: Kenneth Herstowski

I am Jim Boucher (Safety Leader) and I am authorized by Pech Optical to respond on these issues.

On 06/08/2017 Heather K. Wood performed an inspection for the EPA at Pech Optical, 2717 Murray in Sioux City, Iowa. I have enclosed in this e-mail a copy of Heather's finding's along with pictures of the corrections to her findings. The pictures are numbered to match the violation number.

Violation # 1) You will see that I had the copy she was looking for it was in the wrong folder. I understand it should have been with the others and have improved my filing system to assure that next time we are inspected the file of papers will be complete.

Violation #2) We now have a complete list of emergency phone numbers posted on the walls by the phones in the hazardous waste area's.

Violation #3) We had our marketing dept make signs and have fixed them to the container's so they are easily identified.

RCRA 6/19/2017



Violation #4) We had our marketing dept also make sign's identifying nature of the hazard for all the container's and affixed them to the container's so they are all visible.

Violation #5) We have corrected this problem by training the employee's on how important it is to close and latch the container's. We have also installed sign's to remind everyone .

Violation #6) Once again this is a paperwork mix up. We do understand that when the EPA is asking for specific paperwork we need to produce it in a timely fashion. We have changed the filing system to be complete and accurate.

Violation #7) On this one the label was on the container but the container was turned so the label wasn't visible. We are correcting this problem through training manager's and user's to be mindful so the labels are visible.

Violation #8) We have purchased spill kit's and installed them in all the area's.

Pech Optical takes safety and compliance very seriously. Our goal is to maintain compliance and be sure our employees are safe and understand hazardous materials and situations. We take pride in maintaining a safe environment for our employees to work in, and the environment around us.

We were pleased that the inspector came to our business and was able to educate us on a few things that we may have missed or were unaware of.

Jim Boucher  
Safety Leader  
Pech Optical Corp  
1-800-831-2352

## Safety Leader

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**From:** Safety Leader  
**Sent:** Monday, June 19, 2017 1:18 PM  
**To:** Herstowski.ken@epa.gov  
**Cc:** Gerald Koolstra; 'Roger Arrowood'  
**Subject:** Response to notice of preliminary findings  
**Attachments:** Pech Violation Pics.zip

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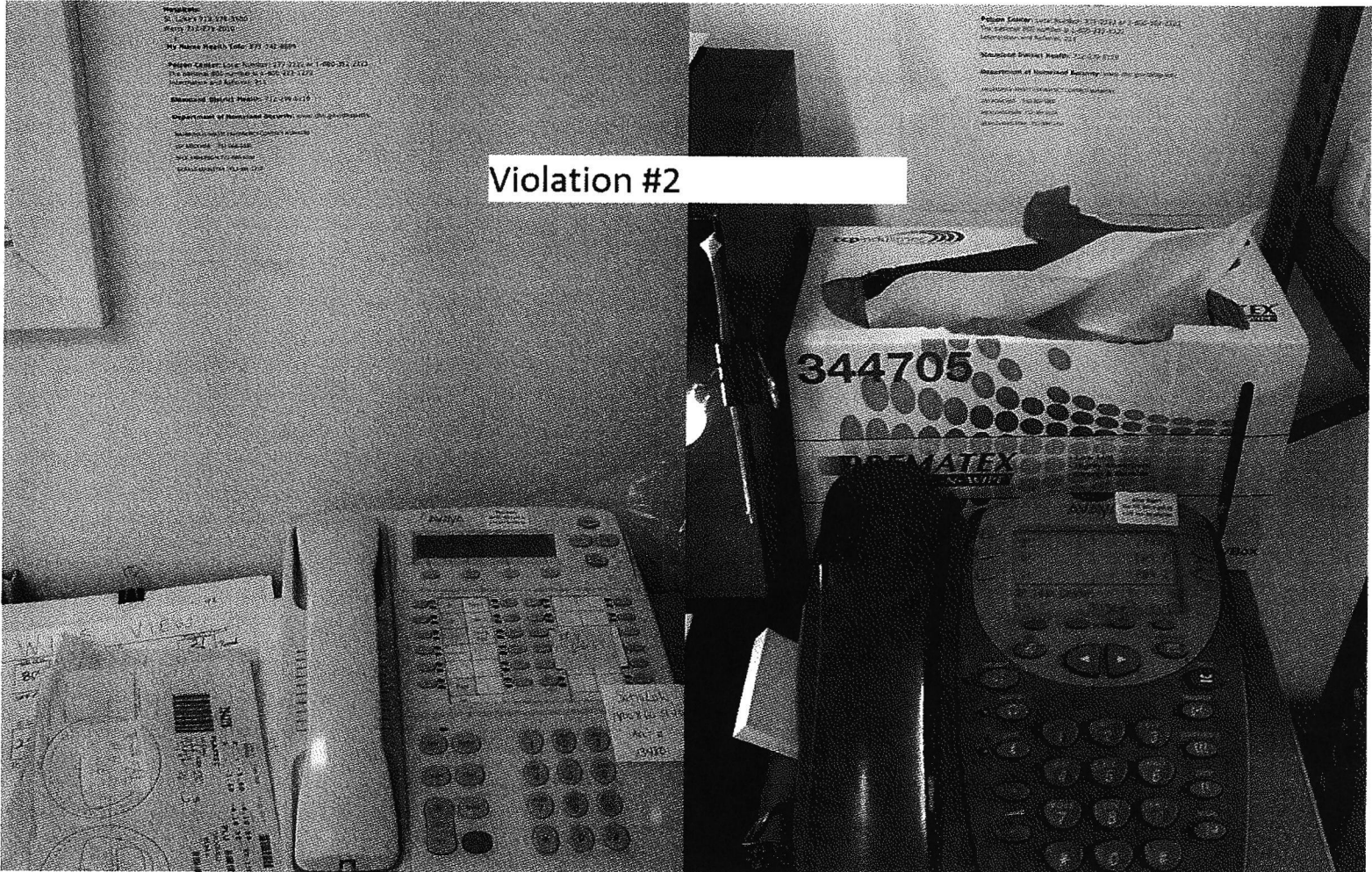




Telephone:  
St. Louis 314-275-5500  
Party 312-875-2010  
Mr. James Joseph Taylor 312-742-8895  
Police Contact Log Number: 312-215-0111 or 1-800-351-2312  
The National 800 number is 1-800-312-1234  
Information and Referral: 312  
Blended District Phone: 312-215-0111  
Department of Homeland Security: 312-215-0111  
St. Louis 314-275-5500  
St. Louis 314-275-5500  
St. Louis 314-275-5500  
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Information and Referral: 312  
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Department of Homeland Security: 312-215-0111  
St. Louis 314-275-5500  
St. Louis 314-275-5500  
St. Louis 314-275-5500  
St. Louis 314-275-5500

Violation #2







ion #3













FACILITY NAME: PECH OPTICAL CORP.  
 ADDRESS: 2717 MURRAY ST  
SIOUX CITY IA 51101  
 EPA ID NUMBER: IA000509976 DATE: 6/8/17

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. FAILURE TO MAINTAIN <sup>Ⓢ</sup> SIGNED COPY OF MANIFEST FROM DESIGNATED FACILITY (40 CFR 262.40(a))
2. FAILURE TO POST EMERGENCY CONTACT INFO AND LOCATION OF RESPONSE EQUIPMENT BY TELEPHONE (40 CFR 262.16(b)(9)(v))
3. FAILURE TO LABEL SATELLITE ACCUMULATION AREA (SAA) CONTAINERS AS "HAZARDOUS WASTE" (40 CFR 262.15(a)(5)(i))
4. FAILURE TO LABEL SAA CONTAINERS WITH NATURE OF THE HAZARD (40 CFR 262.15(a)(5)(ii))
5. FAILURE TO KEEP SAA CONTAINER CLOSED WHEN NOT IN USE (40 CFR 262.15(k)(4))
6. FAILURE TO CONDUCT WEEKLY INSPECTIONS OF CONTAINER ACCUMULATION AREA (CAA) (40 CFR 262.16(b)(2)(iv))
7. FAILURE TO LABEL CAA CONTAINER WITH NATURE OF THE HAZARD (40 CFR 262.16(b)(6)(v)(B))

#### NOTICE OF PRELIMINARY FINDINGS (Continued)

FACILITY NAME: IA000509976 <sup>Ⓢ</sup> PECH OPTICAL CORP.  
 ADDRESS: 2717 MURRAY ST  
SIOUX CITY IA 51101  
 EPA ID NUMBER: IA000509976 DATE: 6/9/17

- 1) FAILURE TO MAINTAIN A SPILL KIT (40 CFR 262.16(b)(8)(2)(c))



ion #7

RD, UN1993, WASTE FLAMMABLE LIQUIDS,  
N.O.S., (METHANOL, ISOPROPANOL), 3, P  
G II (D001)  
F003, D001, D035

\*\* IGNITABLE/TOXIC \*\*

LIQUID

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.  
IF FOUND, CONTACT THE NEAREST POLICE, OR  
PUBLIC SAFETY AUTHORITY, OR THE U.S.  
ENVIRONMENTAL PROTECTION AGENCY

**UN1993**

IN EVENT OF EMERGENCY  
1-800-468-1760 (SK)

## GENERATOR INFORMATION:

ACCOUNT NO. PE23669  
NAME Pech Optical Co  
ADDRESS 2717 Murray St  
ADDRESS  
CITY/STATE SIOUX CITY IA 51111-1137

USA EPA ID NO. IAR000509976

STATE EPA ID NO.

ACCUMULATION START DATE

MANIFEST DOCUMENT NO.

GENERATOR STORAGE DATE

TRANSFER START DATE

TSD STORAGE DATE

OWEL # 40119996

CONTAINER NO.

USE LABEL BY

170410347042

041018

SK DOT # 7101001



SMR

CONT #  
GEN

170410347042  
PE23669  
Pech Optical Co

SK DOT # 7101001  
EXPRES 04/10/18

DOC # 0073410729  
MANF #

ACTUAL WT/GAL

CONT #  
GEN

170410347042  
PE23669  
Pech Optical Co

SK DOT # 7101001  
EXPRES 04/10/18

DOC # 0073410729  
MANF #

ACTUAL WT/GAL



SMR

